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United States of America*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PERFEKT MARKETING, LLC,)	Case No. 2:15-CV-00717-JCM-PAL
)	
Plaintiff,)	(Removal of Case No. A-14-703785-F
)	from the District Court of Clark County,
v.)	Nevada)
)	
LUXURY VACATION DEALS, LLC, <i>et al.</i> ,)	UNITED STATES' MOTION FOR
)	EXTENSION OF TIME TO ANSWER
Defendants.)	OR OTHERWISE PLEAD; ORDER
)	THEREON (First Request)

The United States of America, through undersigned counsel, respectfully moves this Court for an order extending to May 18, 2015, the time in which it must respond to intervening defendant Chicago Title Company, Inc.'s complaint in intervention to interplead funds. In support of its motion, the United States asserts as follows:

1. The United States Attorney for the District of Nevada was served with the summons and complaint in intervention in this action on March 19, 2015.

1 2. On April 17, 2015, this case was timely removed from the District Court of Clark
2 County to this Court.

3 3. Under the Federal Rule of Civil Procedure governing removed actions, an answer
4 would be due 7 days from the date the action was removed, *see* Fed. R. Civ. P. 81(c)(2)(C), in
5 this case, April 24, 2015.

6 4. The United States, its officers, and its employees normally receive 60 days in
7 which to file an answer or otherwise plead. Fed. R. Civ. P. 12(a)(2); 28 U.S.C. §2410(b). In this
8 case, the government's response would be due on May 18, 2015.

9 5. The United States respectfully requests an extension of time which would afford it
10 the full 60 days in which to respond. This would allow counsel for the United States time to
11 receive from the Internal Revenue Service the material necessary to respond to the complaint and
12 defend its interests, as well as obtain the Service's views on the matter. This motion is not being
13 made for delay, but to permit the United States to prepare a cogent and accurate response which
14 would advance this litigation.

15 6. Both the Federal and local civil rules authorize this Court to grant, for good cause,
16 an extension of time in which to answer or otherwise plead. Fed. R. Civ. P. 6(b); LR 6-1.

17 7. In moving for an extension of time, the United States does not waive any defenses
18 listed in Fed. R. Civ. P. 12(h).

1 For these reasons, the United States requests that its motion for an extension of time be
2 granted, and that it be given until and including May 18, 2015, in which to serve its response to
3 plaintiff's complaint.

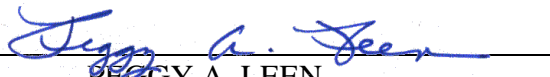
4 Dated: April 22, 2015.

5 Respectfully submitted,

6 CAROLINE D. CIRAULO
7 Acting Assistant Attorney General

8 /s/ Gerald A. Role
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17 IT IS SO ORDERED.

18 
19 PEGGY A. LEEN
20 United States Magistrate Judge

21 Dated: April 30, 2015
22
23

CERTIFICATE OF SERVICE

IT IS CERTIFIED that the foregoing was served this 22nd day of April, 2015, by filing it with the Court's CM/ECF system, which will electronically transmit copies thereof to:

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/s/ Gerald A. Role
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